

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 2001

Patricia Ford, Treasurer
Service Employees International Union
Political Campaign Committee
1313 L Street NW
Washington, DC 20005

Identification Number:

C00004036

Reference:

Amended October Monthly Report (9/1/00-9/30/00), dated 4/23/2001, 12 Day Pre-General Report (10/1/00-10/18/00), Amended 30 Day Post-General Report (10/19/00-11/27/00), dated 1/30/2001, Year End Report

(11/28/00-12/31/00)

Dear Ms. Ford:

This letter is to inform you that as of June 27, 2001 the Commission has not received your response to our requests for additional information dated June 6, 2001. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate responses must be received at the Commission by July 18, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Dominick Ciaraldi on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to

reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director

Reports Analysis Division

Enclosures

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Patricia Ford, Treasurer
Service Employees International Union
Political Campaign Committee
1313 L Street NW
Washington, DC 20005

<sub>. N.N.</sub> 6 2001

Identification Number:

C00004036

Reference: Amended 30 Day Post-General Report (10/19/00-11/27/00), dated 1/30/2001

Dear Ms. Ford:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 23, 28(a) and 28(d), Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Please clarify all expenditures made for "Anti-Nader Auto Calls Oregon and Washington" on Schedule(s) B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Line 23 of the Detailed Summary Page of your report discloses a total of \$126,000.00 in contributions to federal candidates/committees and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$128,000.00.

It appears this discrepancy is a result of the \$2,000.00 disbursement disclosed as a "Redesignated...Contribution to Non-Federal Acct." This

## SERVICE EMPLOYEES INTERNATIONAL UNION POLITICAL CAMPAIGN COMMITTEE PAGE 2

transaction is not disclosed as a "MEMO" entry. Please be aware that redesignations should be disclosed as "MEMO" entries, and thus, should not be included in the corresponding line total. If your committee has disbursed these funds to its not federal account, then a disbursement should be disclosed on a separate Schedule B supporting Line 29. To insure proper and complete reporting and an accurate cash-on-hand balance, this disbursement should be included in the respective line total. Please amend your report to properly disclose this transaction, or provide clarifying information.

-Schedule B supporting Line 29 discloses a disbursement totaling \$15,000 to SEUI PEA Fund International for "COPE reimbursed PEA INTL Fund for money deposited in error". Please provide clarifying information regarding this transaction, including the original receipt date of the mis-deposited funds. If this receipt was not reported, be aware that you must amend the report covering the period during which it was received to disclose the receipt on Schedule A supporting the appropriate line of the Detailed Summary Page. 11 CFR §103.3(b)(1)

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to "Oregon Victory 2000", "Seventeenth CD Victory Fund" and "Tenth CD Victory Fund-Federal". Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

## SERVICE EMPLOYEES INTERNATIONAL UNION POLITICAL CAMPAIGN COMMITTEE PAGE 3

Analysis Division). My local number is (202) 694-1130.

Sincerely,

Dominick Ciaraidi

Reports Analyst

Reports Analysis Division

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